



Department of Energy
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DEC 21 1999

Dr. John Marburger
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Brookhaven National Laboratory
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**SUBJECT: CONTRACT NO. DE-ACO2-98CH10886 - DIRECTION TO PREPARE
FOR PHASE I AND PHASE II VERIFICATION OF BNL'S INTEGRATED
SAFETY MANAGEMENT SYSTEM (ISMS) PROGRAM**

Dear Dr. Marburger:

References: (1). Letter Marburger to Malosh, dated October 28, 1999. Subject: Brookhaven National Laboratory Integrated Safety Management System Description.
(2). Contract NO. DE-ACO2-98CH10886, Mod 28, Article 72 - DEAR 970-5204-2 and Appendix B, Integration of Environment, Safety and Health Into Work Planning Execution, dated July 26, 1999.
(3). "Integrated Safety Management Systems Verification (ISMS) Process, Team Leader's Handbook, DOE-HDBK-3027-99, June 1999.
(4). Letter Sheridan to Malosh, dated November 19, 1999. Subject: Brookhaven National Laboratory's FY99 Annual Self Evaluation Report.

We have conducted a preliminary review of the ISM Program Description submitted for review in Reference (1). The review concluded that the document provides an adequate integrated safety management system definition to initiate the verification review and approval specified in Reference (2), Section (e). However, the Laboratory is encouraged to correct the gaps and institute the improvements identified in Reference (1) Appendix C. In addition, our review of the Program Description indicated some lack of clarity in the Work Activity Section, 3.2.3.2, Site Infrastructure Operations, Maintenance, and Construction Activities. This section describes activities mainly controlled by the Facilities and Operations Directorate. However, there are other activities undertaken at the Lab, outside of the Facilities and Operations Directorate control, that would appear to meet the definition of "Site Infrastructure Operations, Maintenance, and Construction Activities". These are not addressed in this area or adequately in other areas.

The review will be performed in a manner consistent with the protocols established by Reference (3) and the guidance contained in DOE G450.4-1A, ISM System Guide, dated May 27, 1999.

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Based upon the progress BNL has made in implementation of ISM as reported in Reference (4), Section 3.2, we are planning to combine the Phase I and Phase II reviews referred to in DOE G450.4-1A. We believe that this combined approach will be the most effective and efficient method to verify the acceptability of the Laboratory's ISM System. BNL is requested to initiate the necessary actions to provide a certification of readiness for the verification review by March 17, 2000. Documentation should be provided with the certification to indicate where there are gaps in the ISM System or in program implementation, identify whether gaps are "areas for improvement" or deficiencies, and specify the corrective actions being taken. You are also encouraged to update the Standards Based Management System as appropriate during preparations for the review, including implementation of any revisions to the Integrated Safety Management System Description Reference (1).

We have identified April 11-13, 2000, as the dates to conduct the preliminary visit and May 1-12, 2000 the dates to initiate the verification review. We are in the process of selecting the verification team, developing the review plan, and scheduling on site review activities. The review approach will include a review of management systems and documents, interviews with laboratory personnel responsible for the authorization and performance of work, and field observations of the actual authorization and performance of work activities. For planning purposes, the Laboratory should expect the team to conduct a preliminary fact finding visit followed by an approximately two week field effort with subsequent reporting. The team will make a recommendation on the adequacy of the BNL ISM Program Description and provide an evaluation of ISM System implementation.

We will be providing, under separate cover, the Criteria Review and Approach Documents (CRADs) that we will be using in the evaluation. It is expected that this material will be valuable in the development of your letter of readiness, and build focus around your preparation activities. We will coordinate the logistics of the review directly with members of your staff.

If any direction is provided by a Contracting Officer's Representative (COR), which your company believes exceeds the COR's authority, you are to immediately notify the Contracting Officer and request clarification prior to complying with the direction.

If you have any questions, please contact Bob Desmarais at ext. 5434 or Bill Harold at ext. 2924.

Sincerely,



George J. Malosh
Brookhaven Group Manager

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